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RECEIVED BY
AND WILDLIFE SE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE.

November 5, 1997

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To: Dr. Christopher Servheen

From: Sen. Laird Noh

A handwritten signature in dark ink, appearing to be "Laird Noh".

Re: Comments on the Draft EIS for Grizzly Bear Recovery in the Bitterroot Ecosystem.

These comments are my own, as a State Senator representing Legislative District 23, who in private and public life has been close to the application of the ESA with Grizzly Bears and wolves since the early 1970's. They do not necessarily represent the opinions of the Idaho Grizzly Bear Oversight Committee or the Idaho Senate Resources and Environment Committee.

1. The citizens and elected official of the southern portion of the Frank Church Wilderness Area have not been properly involved in the development of the EIS. Although people from all over Southern Idaho are heavy users of the Frank Church Wilderness Area and other Federal, State and private lands directly affected by this proposal, few hearings have been held, even for communities in the Wood River Valley and the McCall area which will be directly impacted. The Snake River Council of Boy Scouts of America is headquartered in Twin Falls. Neither the Scouts nor the many other Churches and organizations which have facilities within the affected area on National Forest lands have been notified by you in any way. I have not so far found a single individual in this legislative district who favors the presence of grizzlies in the areas which they currently use for recreational or economic purposes.

2. Of the many EIS's I have reviewed over the years, this one contains by far the most major errors of scientific procedure and fact, so extensive as to call in question whether it was prepared more for purposes of persuasion of the uninformed (propaganda) than to provide a professional, scientific basis to support rational decisions. It represents an exceptionally biased approach. In several important areas vague terms are employed which make it impossible to interpret key rules.

3 3. Impacts upon recreation use. While the DEIS indicates almost universal concern was expressed over human safety during scoping efforts, the patently absurd assertion is then made that there will be no major impacts upon recreational activities. No studies are presented which objectively compare recreational use, and the nature of that use, in areas before and after grizzly introduction. Invalid comparisons are made in many instances to support the position of the writers, that there will be no impact. PP.6-115, last line, states, "Much of the Experimental Population Area..." has a "...low likelihood of conflicts between grizzly bears and humans." Unmentioned is the fact that major portions of the Experimental Population Area, south and west of the Salmon River have a very high likelihood of conflicts. This Polyanna approach is carried to the extreme when only human mortalities are deemed important, with no data included on human injuries or conflicts. No data is presented to validly compare or forecast recreational use by families, especially with small children, or even by couples. Efforts to compare recreational use in Yellowstone and Glacier with use in the National Forests of the Sawtooths, Pioneers, and around McCall are invalid. Use in the former is concentrated, in part for security from grizzlies, into large camp grounds, hotels and motels. In the latter is is dispersed through out the trails, lakes and forests.

Antecdotal and personal evidence is abundant. I personally survey everyone I meet who camps or backpacks in the affected area, and every single one expresses great concern about exposing families to grizzly bears. Residents of Alaska all express to me that if you get grizzlies, "Always carry a large caliber rifle". A prominent Western Montana writer advised two years ago that she had taken an informal survey of friends and other environmental activists. When these people pursue the outdoors with their families they usually go to the Selway-Bitterroot because there are no bears. If they go by themselves, or with groups of men, they go to the Bob Marshal. Last week, I was advised by a Montana Legislator who had spent some time working on power lines in the Choteau area, to just remember that one grizzly bear is a whole bunch of bear, a whole lot of trouble. "One grizzly and you are up to your fanny in bears." Parents and management involved with the many youth camps in the affected area are universally opposed and apprehensive about bear reintroduction for obvious reasons.

4 I believe key questions used in the public opinion survey used by the USFWS to justify public support for reintroduction were biased by implying that bad human behaviour in the past was responsible for the reduction of grizzly bears in the United States.

Big game hunting is often a family activity in the affected areas south of the Salmon River. The minutes of the Yellowstone Ecosystem Managers' Subcommittee Meeting, October 7-8, 1997, Jackson, Wyoming, states that 50% of conflicts are during hunting season. The minutes state, "Hunters do everything wrong in bear country because they are stalking and being quiet as opposed to what we tell the general populace to do."

5 4. Costs of reintroduction, direct, indirect, public and private are greatly under reported and estimated. The Wyoming wildlife management agency, alone, reports annual expenditures of \$800,000 just from the Yellowstone recovery. There is no mention of the large expenses to "bear proof" the affected area. Costs of steel outfitting gear, camping procedures, bear proofing garbage and food, electric fencing of landfills, countless meetings, travel, education of agency employees and the public, litigation, wildlife studies and other aspects of reintroduction are largely ignored in your analysis.

6 5. Numbers and costs of conflicts are grossly under reported and estimated, especially for livestock. The same subcommittee minutes of Oct. 7 and 8, list 167 bear conflicts in Wyoming, only from January, 1997 through September. They list 97 sheep depredations on just three allotments, and 47 cattle depredations. Yet at 2-14, the Draft EIS attempts to use the Yellowstone Ecosystem as evidence that problems with sheep will be small, 0-44 sheep per year. To my knowledge the only valid information on numbers of livestock and livestock allotments potentially affected by reintroduction were developed by the Co Chair of the Idaho Oversight Committee, Cindy Siddoway, St. Anthony.

A relevant method of projecting the impact of reintroduction and recovery upon sheep would compare the decline in numbers of sheep grazing the Yellowstone system prior to listing with today, with the decline in an equivalent system outside of the Yellowstone recovery area. Direct mortalities upon existing sheep by bears is a very incomplete measure of the impacts. Beginning in 1973, US Fish and Wildlife policy is documented as aggressive removal of sheep from any grizzly bear habitat. That policy continues to be expressed today in Targee Forest proposed plans. PP. 2-14, of the Draft states that, "Changes to the Forest Plans should have to be reviewed by the CMC and agency

biologists..."(My emphasis.) This appears to be another of many examples where the text attempts in a most unobjective way to persuade the reader that impacts will be minimal.

7 6. The draft attempts to leave the impression that recovery will take many years, due to introduction of small numbers of bears and slow recruitment. Tomorrow will not come so soon that we should care. But, the Draft contains no maximum number of bears which can be introduced, only a minimum. Virtually all bear management professionals privately express surprise and concern about the explosion of bears and bear conflicts in the Yellowstone system, over 60 percent outside the Park. The option of moving large numbers of surplus bears into Idaho is already being discussed. This EIS must address the Yellowstone problems because they relate directly to the Idaho reintroduction.

8 7. Rules dealing with problem bears on public lands are unclear and confusing. PP.6-127 (6)(iii), appears to offer a way to deal with problem bears even on public lands, but when taken with other elements of the rules this remains unclear. Since Idaho has very little private land, clear rules to deal with problem bears on public land is essential.

8. PP. 6-126 (5)(ii): 24 hours to report the harassing of bears to two government agencies is foolishly unworkable, and represents a gross lack of understanding of and communication with affected parties.

The ESA makes it very difficult to construct recovery where common sense and public support are dependent upon keeping a highly dangerous, unpredictable species within defined boundaries on public lands little utilized by humans. Here rules must be straightforward. Final rules which clearly limit bears to the Selway-Bitterroot Wilderness and the Frank Church Wilderness east and north of the Salmon river, along with the concept of the Citizens Management Committee would constitute a major improvement in the preferred alternative.